Agenda Item #8

STATE OF MAINE COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES 135 STATE HOUSE STATION

AUGUSTA, MAINE 04333-0135

To:

Commissioners

From: Jonathan Wayne, Executive Director

Date: July 17, 2012

Re:

Anonymous Request to Investigate Campaign Reporting by Candidate Sara Gideon

Sara Gideon was a Maine Clean Election Act (MCEA) candidate for the Democratic nomination for Maine House of Representatives, District 106 (Freeport). She had two opponents in the primary election, and won the nomination. On June 27, 2012, the Commission received an anonymous letter that asks the Commission to consider whether she has disclosed all of her campaign contributions and expenditures for the primary election in campaign finance reports. The person who wrote the request may not be aware of some of the exceptions to campaign finance reporting (e.g., candidates do not need to report receiving the services of volunteers, donated materials used for making campaign signs, or real or personal property with a value of up to \$100 provided to a campaign by volunteers). Also, the person making the request may not have realized that the last report filed by the Gideon campaign only covered activity through May 29, 2012.

With the assistance of an attorney, Ms. Gideon provided a four-page letter, along with invoices and e-mail correspondence supporting the response. The Commission staff recommends taking no further action on the request for an investigation.

PHONE: (207) 287-4179

FAX: (207) 287-6775

Legal Requirements for Maine Clean Election Act Candidates

In return for receiving public campaign funds, MCEA candidates must meet certain restrictions on their contributions and expenditures. After "certification" (qualifying for MCEA funding), the candidate may only spend public campaign funds to promote their election. (21-A M.R.S.A. § 1125(6)) Prior to certification, they may collect and spend only seed money contributions of up to \$100 per individual donor. After certification, they may not receive any cash or in-kind contributions. (21-A M.R.S.A. § 1125(2-A))

In-kind contributions are goods or services received by a candidate without charge, or at a charge that is less than the usual and customary charge for such goods or services.

(Commission Rules, Chapter 1, Section 6(4)) For example, if someone gave to a candidate a computer or valuable poll results without charging the candidate, those items would constitute an in-kind contribution. A contribution also results if someone spends money to promote the candidate at the request or suggestion of a candidate, or if the expenditure is made in cooperation, consultation, or in concert with the candidate. (21-A M.R.S.A. § 1015(5))

Certain goods or services are exempt from the definition of contribution or expenditure.

These are, in effect, goods, services, or activities which people may donate or participate in without making a contribution to a candidate. In this case, the relevant exceptions are:

(1) The value of services provided without compensation by individuals who volunteer a portion or all of their time on behalf of a candidate or political committee;

- (2) The use of real or personal property ... voluntarily provided by an individual to a candidate in rendering voluntary personal services for candidate-related activities, if the cumulative value of these activities by the individual on behalf of any candidate does not exceed \$100 with respect to any election; ...
- (8-B) Wood or other materials used for political signs that are found or contributed if not originally obtained by the candidate or contributor for campaign purposes

(21-A M.R.S.A. §§ 1012(2)(B)(1), (2) & (8-B))

Sufficiency of the Request for Investigation

Any person may request that the Commission investigate the contributions received by a candidate or expenditures by a candidate. (21-A M.R.S.A. §§ 1003(1) & (2)) The Commission shall make the investigation "if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred." (21-A M.R.S.A. § 1003(2))

Anonymous Complaints

There is no policy in the Commission's statutes or Rules concerning anonymous complaints. In addition to 21-A M.R.S.A. § 1003, requests for investigation of a campaign finance violation are governed by Chapter 1, Section 4(2)(C) of the Commission's Rules. As the director of the agency staff, my personal view is that anonymous complaints should be disfavored, for a couple of reasons. Elected officials and other candidates deserve to know who is asserting that they have committed a legal violation. Some complaints are based on misunderstandings of the facts or law, and an anonymous complaint rules out communication with the complaining party.

Specificity and Personal Knowledge

The Commission's Rules specify that "Statements [in a request for investigation] should be made upon personal knowledge. Statements which are not based upon personal knowledge must identify the source of the information which is the basis for the request." (Chapter 1, Section 4(2)(C))

A provision in the Commission's Rules lists two reasons why the Commission staff may reject a request for a campaign finance investigation: "An oral report of a violation, or a written request containing insufficient detail to specify the violation charged, does not constitute an official request for a Commission determination, and a person registering such a complaint will be so notified." (Chapter 1, Section 4(2)(D))

In this case, after conferring with the Commission's Counsel, the staff decided to treat the anonymous letter as an official request for an investigation and we scheduled it for your consideration. In our opinion, the complaint contains sufficient detail to articulate the alleged violation. The violation alleged is that the candidate has not reported all of her campaign contributions or expenditures, as required in 21-A M.R.S.A. §§ 1017(5) and 1125(12). Although it is not as explicit as it could be, the complaint seems to be mostly based on the personal knowledge of the person requesting the investigation (except for the last item concerning contributions of professional campaign management services).

Specific Allegations

I have reviewed all of the allegations in the request, and have considered the candidate's response. I recommend taking no further action on the request. The allegations are

discussed below, in order. (I refer to the person requesting the investigation as the complainant, even though he or she did not refer to the letter as a complaint.)

1. The complainant writes that the Gideon campaign advertised for two weeks in the local *Forecaster* newspaper, but its June 1, 2012 campaign finance report shows payments for only one week of advertising.

The Gideon campaign responds that it paid the *Forecaster* for one ad to run on May 24, 2012. The newspaper ran the ad incorrectly and, to compensate for the error, it ran a corrected version of the ad a second time on May 31, 2012.

The staff notes that the Commission's Rule defining an in-kind contribution states that when a commercial vendor has provided a discount to a candidate because of a defect in performance, the vendor has not made a contribution to the candidate.

(Chapter 1, Section 6(4))

2. The complainant writes that the Gideon campaign did not account for all the expenses involved with the creation of hand-painted wooden campaign signs.

The Gideon campaign responds that the campaign purchased only paint for the wood signs. It states that other materials and supplies meet the contribution exception for wood and other materials used for political signs (quoted on page 3 of this memo). The campaign states that volunteers donated other materials, including

used stencils, foam core boards to make new stencils, and cans of left-over spray paint. Donated wood came from four other sources, according to the campaign. It states that no plywood or stakes were purchased for this campaign.

The staff notes that there is no dollar limit on the amount of wood or other sign materials a campaign may receive under the exception relied upon by the campaign. *Any* individual or association may donate wood or other sign materials, as long as the donor did not obtain the materials for campaign purposes. Also, another exception could potentially apply to the donated supplies: campaign volunteers may use real or personal property in rendering voluntary personal services to a candidate if the value of the activities does not exceed \$100, under another exception quoted on page 3.

 The complainant writes that the Gideon campaign used promotional materials, including customized pens, a large banner, and hand-held signs, which were not accounted for in its campaign finance reports.

The Gideon campaign responds that it did not use customized pens. The large banners were purchased with seed money and properly disclosed in the Seed Money Report. On the day of the primary election, a large banner was hand-held by several campaign workers on Holbrook Street.

4. The complainant writes that the Gideon campaign purchased 100 car magnets for less than the listed sales price.

The Gideon campaign responds that it purchased 100 "large magnets" from Vistaprint, which it appropriately reported on the June 1 report. The campaign did receive a significant discount from the listed sales price by using a promotional discount code available to anyone on Vistaprint's email list.

The staff notes that, under the Commission's Rules, if a vendor grants to a candidate a discount and provides a substantially similar discount to other customers in the ordinary course of business, the candidate has not received an in-kind contribution. (Chapter 1, Section 6(4))

 The complainant writes that the Gideon campaign used professional photography in its campaign materials but did not account for those services in its campaign finance reports.

The Gideon campaign responds that the professional photography services were provided to the campaign by the photographer on a volunteer basis. (Volunteerism is an exception to the definition of contribution, under the exception quoted on page 2.)

6. The complainant writes that the amount of postage the Gideon campaign purchased does not match the amount of mailing the campaign undertook.

The Gideon campaign responds that all postage was paid for using only campaign funds. 1500 postcards were purchased and appropriately reported. 1258 postcard were actually mailed. The campaign purchased sufficient postage for these mailing between March 22, 2012 and June 1, 2012, and either has appropriately reported, or will appropriately report, the postage purchases.

7. The complainant writes that they believe the Gideon campaign made use of professional campaign management services provided by personal friends, including a friend who flew in for election day to help the campaign, but did not account for those services or expenses in its campaign finance reports.

The Gideon campaign responds that all campaign services were provided by people on a voluntary basis and that the only professional services provided on a voluntary basis were the previously mentioned photography and some graphics design services.

The staff notes that the Maine Legislature has decided as a matter of policy to exempt volunteerism from the definition of contribution. Candidates may accept volunteer services from individuals without limitation, including by individuals with specialized talents such as photography and graphic design services. I

personally provided this advice to Ms. Gideon when she called our office some months ago to verify that volunteered services are not a contribution.

Although not discussed by the candidate, I recommend that you take no action on any travel expenses by an out-of-state friend. All campaigns have scarce financial resources, and most choose not to reimburse their volunteers for travel expenses. The Legislature intended to encourage volunteerism by enacting the exception for volunteerism in 21-A M.R.S.A. § 1012(2)(B)(1). If a dedicated supporter of a candidate wishes to spend a significant amount of their personal funds *on their own travel* in order to volunteer for a candidate, that should be viewed as positive part of volunteerism. Requiring volunteers to quantify their travel costs throughout a campaign and to charge those costs to a candidate's campaign would, in my opinion, deter volunteerism, be impractical, and could limit activities that are protected by the First Amendment. I am happy to discuss this topic further at the July 25, 2012 meeting if you would like.

Recommendation

I recommend that you take no further action on the request. The person making the request has not shown sufficient reasons for believing that a violation may have occurred.

Thank you for your consideration of this memo.

RECEIVED

JUN 27 2012

Maine Ethics Commission

Mr. Jonathan Wayne Maine Ethics Commission 135 State House Station Augusta, ME 04333

Re: Clean Election Candidate Spending - House District 106

And the second of the second

Dear Mr. Wayne,

I am writing to ask you to please review the campaign spending by Sara Gideon, a clean election candidate in House District 106. I was shown her campaign filling reports and I believe they do not accurately cover all of the expenditures Ms. Gideon made during the reporting period.

Items which do not seem to be included or are a question:

- -only one Forecaster ad is listed, but the candidate had 2?
- the candidate used a large number of wood signs in the primary campaign. Nothing is listed for wood or stencils, or other materials except for paint?
- the candidate had various promotional materials at public events (customized pens, a large banner, special hand held election day signs), but they are not listed?
- the candidate lists 100 car magnets at a price that is much lower than the selling company's list price?
- professional photography was used in campaign materials, but not listed?
- postage expense -doesn't match mailing amt?
- there reportedly were contributions of professional campaign management services made by personal friends, including a friend who flew in for election day to help the campaign nothing is listed for value of services/travel expenses...?

It's not clear that this candidate stayed within the amount allowed under the clean election law. Extra spending would have given her an unfair advantage in the primary election and for the upcoming general election in November.

I am sorry to have to submit this review request anonymously, but I am very worried that I would be targeted and attacked if I sign my name to this letter. There is a long track-record of harassment and intimidation here in our town and I have personally seen this happen many, many times. They have made it very intimidating to ask questions, even to the point where you can lose your job. People are openly talking about Ms. Gideon spending so much in the primary, so it is important to the clean election program that it be looked at, but I am afraid to be known to have actually raised it with you.



STATE OF MAINE COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES 135 STATE HOUSE STATION AUGUSTA, MAINE 04333-0135

June 28, 2012

By E-Mail and U.S. Mail Ms. Sara Gideon 78 Bow Street Freeport, Maine 04032

Dear Ms. Gideon,

Yesterday, the Maine Ethics Commission received the attached letter in the U.S. Mail requesting that the Commission review your 2012 campaign spending to verify that all campaign expenditures have been made with seed money or Maine Clean Election Act (MCEA) funds. The letter expresses the concern that persons connected to the campaign may have spent money other than seed money or MCEA funds, providing you with an unfair advantage over your primary election opponents.

Unfortunately, the letter is anonymous. So, the Commission staff is unable to contact the writer to obtain additional information, or to explain campaign finance reporting requirements (e.g., exceptions for volunteerism or donated wood).

Having worked with many candidates, I appreciate that it is frustrating to have an anonymous request filed against you. Nevertheless, the staff of the Commission routinely makes various types of inquiries to MCEA candidates to verify that they are meeting the requirements of the program, including audits, compliance reviews, and follow-up inquiries. Given the circumstances, we believe it is appropriate to ask for a written response from the campaign.

Could you please respond in writing to the following questions by July 13, 2012? In your response, please answer the following questions and provide any additional information you would like. (When referring to your "campaign," I mean you, volunteers or paid staff, and any other friends, family members, or other individuals acting with your knowledge to promote your nomination or election.)

- 1. How many advertisements promoting your nomination have appeared in the Forecaster newspaper to date? Please provide a list of the campaign's payments for the ads.
- 2. Please describe all purchases made by the campaign for materials for homemade signs (e.g., wood or stencils). Also, please describe all materials for signs that were donated.

OFFICE LOCATED AT: 45 Memorial Circle, Augusta, Maine WEBSITE: www.maine.gov/ethics

FAX: (207) 287-6775

- 3. Did the campaign use customized pens, a large banner, or hand-held election day signs to promote your nomination? If so, please state the sources of funds used for these expenses, and whether they have been or will be listed in campaign finance reports.
- 4. Was the May 3, 2012 purchase of 100 magnets from Vistaprint for car magnets or for postcard-sized magnets (sold by Vistaprint as "large magnets")? In either case, did the campaign receive these goods at a discount or at a regular price that is posted on the company's website?
- 5. Were all professional photography services provided to the campaign on-a volunteer basis?
- 6. Did the campaign use postage that was paid for with any source other than campaign funds?
- 7. Were all professional campaign services provided to the campaign on a volunteer basis? If not, please describe campaign services which were paid for by any source.

Thank you very much for taking time to respond. Please call me at 287-4179 or e-mail me at Jonathan. Wayne@maine.gov if you have any questions or you need additional time to respond.

Sincerely,

Johathan Wayne

Executive Director

ce: Candidate Registrar Benjamin P. Dyer

RECEIVED

JUN 27 2012

Maine Ethics Commission

Mr. Jonathan Wayne Maine Ethics Commission 135 State House Station Augusta, ME 04333

Re: Clean Election Candidate Spending - House District 106

Dear Mr. Wayne,

I am writing to ask you to please review the campaign spending by Sara Gideon, a clean election candidate in House District 106. I was shown her campaign filing reports and I believe they do not accurately cover all of the expenditures Ms. Gideon made during the reporting period.

Items which do not seem to be included or are a question:

- -only one Forecaster ad Is listed, but the candidate had 2?
- the candidate used a large number of wood signs in the primary campaign. Nothing is listed for wood or stencils, or other materials except for paint?
- the candidate had various promotional materials at public events (customized pens, a large banner, special hand held election day signs), but they are not listed?
- the candidate lists 100 car magnets at a price that is much lower than the selling company's list price?
- professional photography was used in campaign materials, but not listed?
- postage expense -doesn't match mailing amt?
- there reportedly were contributions of professional campaign management services made by personal friends, including a friend who flew in for election day to help the campaign nothing is listed for value of services/travel expenses...?

it's not clear that this candidate stayed within the amount allowed under the clean election law. Extra spending would have given her an unfair advantage in the primary election and for the upcoming general election in November.

I am sorry to have to submit this review request anonymously, but I am very worried that I would be targeted and attacked if I sign my name to this letter. There is a long track-record of harassment and intimidation here in our town and I have personally seen this happen many, many times. They have made it very intimidating to ask questions, even to the point where you can lose your job. People are openly talking about Ms. Gideon spending so much in the primary, so it is important to the clean election program that it be looked at, but I am afraid to be known to have actually raised it with you.

PretiFlaherty

Daniel W. Walker dwalker@preti.com

July 12, 2012

VIA E-MAIL AND HAND DELIVERY

Mr. Jonathan Wayne
Executive Director
Maine Commission on Governmental Ethics
and Election Practices
135 State House Station
Augusta, ME 04333

RECEIVED

JUL 1:2 2012

Maine Ethics Commission

RE: Anonymous Complaint Regarding Sara Gideon, Democratic Candidate for the Maine House of Representatives, District 106.

Dear Jonathan,

I write on behalf of Sara Gideon, Democratic Candidate for the Maine House of Representatives, District 106, in response to an anonymous letter sent to the Maine Commission on Governmental Ethics and Election Practices ("Ethics Commission").

During her campaign, Ms. Gideon vigorously sought guidance in order to best comply with both the letter and spirit of Maine Clean Election Law. She and various volunteer campaign staff regularly called the Commission staff (both Candidate Registrar Benjamin Dyer and Director Wayne) to ensure that they were complying with Maine law at all times in the campaign.

The anonymous letter in this case makes a number of assertions, attacking Ms. Gideon's campaign, with absolutely no factual support. Each of these groundless assertions could have been explained if the anonymous complainer had simply contacted Ms. Gideon or one of the volunteer campaign staff. We will respond to each assertion (and each question posed by you) in turn and demonstrate that each is without merit.

1. How many advertisements promoting your nomination have appeared in the Forecaster newspaper to date? Please provide a list of the campaign's payments for the ads.

The campaign paid for one 1/8 page, black and white advertisement, guaranteed on Page 5 of The Northern Forecaster. Because the newspaper created the advertisement, ran it without proofing, and subsequently ran the ad incorrectly, they offered the campaign a "make-good" or corrected ad the following week. See Exhibit A (Cindy Barnes, Forecaster e-mail, July 11, 2012). Therefore, the Forecaster only charged for one advertisement, and that expenditure was listed in the applicable campaign report. See Exhibit B (Forecaster Invoice/Statement, May 31,

Preti Flaherty Beliveau & Pachios LLP Attorneys at Law

46 Memorial Circle | Augusta, ME 04330 | TEL 207.623.5300 | FAX 207.623.2914

www.preti.com

Augusta 3096056.1 Boston

Concord

DC

Portland

Preti Flaherty July 12, 2012 Page 2

2012); Exhibit C (11-Day Pre-Primary Report, Schedule B, June 1, 2012 – 5/17/12 expenditure).

2. Please describe all purchases made by the campaign for materials for homemade signs (e.g. wood or stencils). Also, please describe all materials for signs that were donated.

The campaign purchased only paint for the hand-painted wooden signs. See Exhibit C (11-Day Pre-Primary Report, Schedule B, June 1, 2012 – 5/7/12 and 5/18/12 expenditures). The remainder of the materials used to make the signs were donated to the campaign, which is specifically listed as a circumstance that is not a "contribution" under Maine campaign finance law. See 21-A M.R.S.A. §1012(2)(B)(8-B)(The term "contribution" does not include "[w]ood or other materials used for political signs that are found or contributed if not originally obtained by the candidate or contributor for campaign purposes.") Used stencils were borrowed from a local volunteer and foam core boards were donated from the volunteer campaign manager, to create stencils to make the signs. Additional left-over spray paint was gathered and used from the volunteer campaign manager and from the candidate. Donated plywood came from four other local sources. Importantly, no plywood or stakes were purchased for this campaign.

3. Did the campaign use customized pens, a large banner, or hand-held Election Day signs to promote your nomination? If so, please state the sources of funds used for these expenses, and whether they have been or will be listed in campaign finance reports.

The campaign neither purchased nor used any pens that were customized for the campaign. The campaign did use large banners, which were purchased with seed money and documented in the seed money report. See Exhibit D (Vistaprint receipt, February 15, 2012); Exhibit E (Seed Money Report, Schedule B, March 25, 2012 – 2/15/12 expenditure). These were used on Election Day and were "hand held" by campaign workers on Holbrook Street.

4. Was the May 3, 2012 purchase of 100 magnets from Vistaprint for car magnets or for postcard-sized magnets (sold by Vistaprint as "large magnets")? In either case, did the campaign receive these goods at a discount or at a regular price that is posted on the company's website?

The Vistaprint magnets were ordered from Vistaprint and were listed as "Large Magnets." The volunteer campaign manager, used a promotional code that was available to anyone on Vistaprint's email list and, as a result, received a significant discount on the purchase of these magnets. The receipt was recorded and the item was documented in the 11-Day Pre-primary Report. See Exhibit F (Vistaprint receipt, May 3, 2012); Exhibit C (11-Day Pre-Primary Report, Schedule B, June 1, 2012 – 5/3/12 expenditure).

5. Were all professional photography services provided to the campaign on a volunteer basis?

All professional photography services provided to the campaign were done on a volunteer basis. Maine election law provides an exception to the definition of contribution for volunteer services. See 21-A MRSA §1012(2)(B)(1)(The term "contribution" does not include "[t]he value of

PRETI FLAHERTY July 12, 2012 Page 3

services provided without compensation by individuals who volunteer a portion or all of their time on behalf of a candidate or political committee.")

6. Did the campaign use postage that was paid for with any source other than campaign funds? Specifically, the number of postcards printed (500) does not match the expense for postage in the June 1, 2012 report, as the campaign states that postage was purchased for 200 cards. Please explain this discrepancy.

The campaign used campaign funds only to purchase postcards and postage. Specifically, the total number of postcards purchased during the entire Primary campaign was 1,500. See Exhibit G (Dale Rand Printing invoices - April 19, 2012 (500 postcards), May 31, 2012 (1000 postcards)); Exhibit C (11-Day Pre-Primary Report, Schedule B, June 1, 2012 - 4/19/12 and 5/31/12 expenditures). However, only 1,258 postcards were actually sent during the Primary campaign. Therefore, \$402.56 was necessary in postage to send 1,258 postcards (i.e. \$0.32 x 1,258 = \$402.56). On March 22, 2012, the campaign purchased \$38.40 in postage. See Exhibit H (Freeport Main Post Office receipt); Exhibit E (Seed Money Report, Schedule B, March 25, 2012 - 3/22/12 expenditure). On May 10, 2012, the campaign purchased \$64.00 in postage. See Exhibit I (Freeport Main Post Office receipt); Exhibit C (11-Day Pre-Primary Report, Schedule B. June 1, 2012 - 5/10/12 expenditure). On June 1, 2012, the campaign purchased \$300.16 in postage, which will be reported in the upcoming July 24th 42-Day Post-Primary Report. In summary, \$38.40 + \$64.00 + \$300.16 = \$402.56, which is the exact amount necessary to send 1,258 postcards. This amount came entirely from campaign funds and was properly reported on the applicable expenditure report, and the remaining balance will be properly reported on the 42-Day Post-Primary Report.

7. Were all professional campaign services provided to the campaign on a volunteer basis? If not, please describe campaign services which were paid for by any source.

Again, all campaign services provided to the campaign were on a volunteer basis. The only professional services provided to the campaign were the photography services referenced in question 5 and some graphic design services. See 21-A MRSA §1012(2)(B)(1).

In summary, each one of these assertions made by the anonymous complainer is groundless and has been fully refuted in this response. Moreover, nothing in the single page letter, requesting a review of Ms. Gideon's campaign, provides any basis for the Commission to consider this complaint, and you should use your discretion to deny this request for an investigation.

Furthermore, pursuant to Chapter 1, section 4(2)(C) of the Ethics Commission rules, the anonymous request for an investigation is inadequate:

Any person (as defined in 21-A M.R.S.A. §1001) may make an official request for a Commission investigation or determination by filing a written request at the Commission's office, setting forth such facts with sufficient details as are necessary to specify the alleged violation. Statements should be made upon personal knowledge. Statements which are not based upon personal

PRETI FLAHERTY

July 12, 2012

Page 4

knowledge must identify the source of the information which is the basis for the request, so that respondents and Commission staff may adequately respond to the request.

Me. Ethics Comm'n, 94 270 CMR 1-4.2.C.

The anonymous written request neither adequately demonstrates that it was made with "personal knowledge" nor identifies any source of the information, which is the basis for the request. As a result, pursuant to §4(2)(D), "a written request containing insufficient detail to specify the violation charged, does not constitute an official request for a Commission determination, and a person registering such a complaint will be so notified." Of course, because the request was made anonymously, they cannot be notified in this case.

For the foregoing reasons, we respectfully request that this matter be dismissed.

Daniel W. Walker

DWW:ryp

Cc: Sara Gideon

Beth Edmonds

Exhibit A

Walker, Daniel W.

From: Sent:

Sara Gideon <saraigideon@gmail.com> Wednesday, July 11, 2012 4:46 PM

To: Subject: Walker, Daniel W. Fwd: statement

----- Forwarded message -----

From: Karin Vannostrand kapervan@gmail.com>

Date: Wed, Jul 11, 2012 at 1:28 PM

Subject: statement

To: Sara Gideon < saraigideon@gmail.com >

Karin Perlotto VanNostrand cell <u>207-798-2839</u> home <u>207-865-6336</u>

----- Forwarded message -----

From: Cindy Barnes < cbarnes@theforecaster.net>

Date: Wed, Jul 11, 2012 at 1:06 PM

Subject: Re: copy of invoice

To: Karin Vannostrand kaperyan@gmail.com

The second ad for Sara Gideon dated 5/31/12 ran free of charge as a make good for production errors in the ad that ran 5/24/12

Cindy Barnes
Sales/Marketing
The Forecaster
781-3661, x 104
<u>cbarnes@theforecaster.net</u>
http://twitter.com/ForecasterAds

On Tue, Jul 10, 2012 at 5:59 PM, Karin Vannostrand < kapervan@gmail.com > wrote: Thanks Karen/Cindy. We have the invoice. What we need to go with it, to explain the \$0.00 owed for the second run, was a statement that it was a "make good" because the first run had errors.

The accountants will want to know WHY the invoice lists zero owed for that ad. Mercil!!

Karin

Karin Perlotto VanNostrand cell 207-798-2839 home 207-865-6336

On Tue, Jul 10, 2012 at 1:25 PM, Cindy Barnes <<u>cbarnes@theforecaster.net</u>> wrote: Hello KarinHere is a copy of your invoice - should be the best proof.
Karen for ...

Cindy Barnes
Sales/Marketing
The Forecaster
781-3661, x 104
cbarnes@theforecaster.net
http://twitter.com/ForecasterAds

Sara Gideon for State Representative - District 106, Freeport & Pownal 78 bow street - freeport, me 04032 207.865.9593 (mobile) sara@saragideonforME.com or saraigideon@gmail.com www.saragideonforME.com



http://www.facebook.com/pages/Sara-Gidcon-for-State-Representative/2329040334598887sk=wall





ADVERTISING Invoice/Statement

5 Fundy Rd Falmouth, ME 04105 Phone 207-781-3661 Fax 207-781-2060 FED TAX I.D.01-0107710

KARIN VANNOSTRAND 31 HERON POND LANE FREEPORT, ME 04032

Please return

slub below with payment

PAGE#:	BILLING DATE:
1	05/31/12
ACCOUNT NUMBER	EXPIRATION DATE
216939	
CONTRACT	QUANTITY
INSERTS	REVENUE
TOTAL	USAGE
inserts	HEVENUE
ACCOUNT RE	RESENTATIVE
•	Barnes
207-78	1-3661

All payments are due by the 15th.

DATE	DESCRIPTION	ORDER#	PAGE	COL	INCHES	TIMES	RATE	AMOUNT
05/24/12	SARA GIDEON	1059581		2	4	1	21.25	
	FNO, Page 5 F]						
05/31/12	POLITICAL	1061292		2	4	1	21.25	0.00
	FNO, Page 5 F							
05/17/12	CREDIT CARD PYMT · THANK YOU							-195.50

CURRENT	OVER 30 DAYS	OVER 60 DAYS	OVER 90 DAYS	AMOUNT DUE
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<u> </u>				PLEASE PAY THIS AMOUNT

Returned checks will be subject to a \$20.00 Service Charge. I 1/2% Service Charge will be charged on all invoices over 30 days old. This is an annual percentage rate of 18%.

IMPORTANT	To insure proper credit to your account, return this slub with your check.	[MPORTANT
ACCOUNT INFORMATION		BILLING DATE
KARIN VANNOSTRAND 31 HERON POND LANE FREEPORT, ME 04032 CREDIT CARD INFORMATION	REMIT TO The Forecaster PO Box 4400 Lewiston, MB 04243-4400	05/31/12 ACCOUNT NUMBER 216939 TOTAL AMOUNT DUE \$0.00 AMOUNT PAID
CREDIT CARD NUMBER	EXP, DATE THREE DIGIT SECURITY CODE (O back of eard)	CHECK#
SIGNATURE (Required for cred't card payment)	CARD TYPE (Check One)	

Payment Receipt
Payment Date:
Ad Start Date:

05/17/12 Batch - 18842

207-798-2839 Phone:

216939 Account Name:

Falmouth, ME 04105 207-781-3661

THE FORECASTER 5 Fundy Rd.

Karin VanNostrand 31 heron Pond Lane

Addr1: Addr2 City/State/Zip:

Freeport, ME 04032

Order Type: Ticket #:

Total

Discounts: Edras:

Net Total:

Balance: Card# 195.50 CREDIT MasterCard cgoodenow Amount Paid: Payment Type: Card/CheckNo: Received By:

Exhibit C



COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES Mail: 135 State House Station, Augusta, Maine 04333 Office: 45 Memorial Circle, Augusta, Maine

Website: www.maine.gov/ethics

Phone: 207-287-4179 Fax: 207-287-6775

2012 CAMPAIGN FINANCE REPORT

	CANDIDAT			
SARA GIDEON		TEL:		
78 BOW STREET		FAX:	aradidaanfarmaina@amail.com	
FREEPORT, ME 04032 OFFICE SOUGHT: REPRESENTATIVE DIST	FRICT: 106	E-WAIL: S	aragideonformaine@gmail.com	
OFFICE GOODITT. NEFAECENTATE DIO	111101. 100			
	TREASURE	R		
BETH EDMONDS		TEL: (207)865-3869	
122 HUNTER ROAD	1	FAX:		
FREEPORT, ME 04032		E-MAIL: bedmondsfcl@gmail.com		
	 	FILENCOLIN		
TYPE OF REPORT	DUE DAT	E	REPORTING PERIOD	
11-DAY PRE-PRIMARY (MCEA)	06/01/2012		3/26/2012 - 5/29/2012	
NO FINANCIAL ACTIVITY IN THIS REPORTING	PERIOD FOR SCHED	ULES E		
		01.14.37.0543°-145		
	CERTIFICATI	ON		
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COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: SARA GIDEON

REPORT FILED ON: 6/1/2012

IF THIS REPORT IS FILED BY AN AUTHORIZED AGENT OF THE CANDIDATE, THE CANDIDATE, TREASURER AND AGENT ARE LIABLE FOR ANY VIOLATIONS OF MAINE CAMPAIGN FINANCE LAW (21-A M.R.S.A. CHAPTER 13) AND THE COMMISSION'S RULES THAT MAY RESULT FROM THE FILING OF A FALSE OR INACCURATE REPORT.

UNSWORN FALSIFICATION IS A CLASS D CRIME (17-A M.R.S.A. § 453).

SCHEDULE A MAINE CLEAN ELECTION ACT PAYMENT AND AUTHORIZATIONS (THIS PERIOD ONLY)

DATE	ТҮРЕ	AMOUNT
3/29/2012	MCEA INITIAL PAYMENT - PRIMARY	\$1,424.19
	TOTAL MCEA PAYMENTS AND AUTHORIZATIONS □>	\$1,424.19

SCHEDULE B EXPENDITURES

	EXPENDITURE TYPES					
CNS	Campaign consultants	POL Polling and survey research				
CON	Contribution to other candidate, party, committee	POS Postage for U.S. Mail and mail box fees				
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO Other professional services				
FND	Fundralsing events	PRT Print media ads only (newspapers, magazines, etc.)				
FOD	Food for campaign events, volunteers	RAD Radio ads, production costs				
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL Campaign workers' salaries and personnel costs				
мнѕ	Mail house (all services purchased)	TRV Travel (fuel, mileage, lodging, etc.)				
OFF	Office rent, utilities, phone and internet services, supplies	TVN TV or cable ads, production costs				
отн	Other	WEB Website design, registration, hosting, maintenance, etc.				
PHO	Phone banks, automated telephone calls	Only these expenditure types require a remark: CNS, EQP, FNE OTH, PRO, SAL, TRV.				

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
05/17/2012	THE FORECASTER/SUN	Ad in The Forecaster	PRT	\$195.50
05/03/2012	VISTAPRINT	100 Large Magnets	LIT	\$49,99
04/19/2012	DALE RAND PRINTING	500 Post Cards	LIT	\$78.78
04/27/2012	JUST YARD SIGNS,COM	Yard Signs	LIT	\$378.00
05/10/2012	UNITED STATES POSTAL	200 Post Card Stamps	PO\$	\$64700
05/07/2012	THE HOME DEPOT	paint for campaign signs	ОТН	\$62.30
05/18/2012	THE HOME DEPOT	Paint for Signs purchase by Sara Gideon, reimbursed on 5/30/12	НТО	\$54.117
05/15/2012	TREASURER - STATE OF MAINE	ME Sales Tax payment - Items purchased without ME tax paid, Reimbursement to Sara Gideon 5/30/12	ОТН	\$25.02
		TOTAL EXPENDIT	URES 🖒	\$907.73

SCHEDULE D UNPAID DEBTS AND OBLIGATIONS

- A debt or obligation is incurred if a candidate places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the candidate has not paid.
- This schedule is a list of all debts and obligations of the campaign as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION ,	AMOUNT
05/25/2012	DALE RAND PRINTING 104 WASHINGTON AVENUE PORTLAND, ME 04101	POSTCARDS + TAX	\$220)50
		TOTAL UNPAID DEBTS AND OBLIGATIONS ⇒	\$220.50

SCHEDULE F SUMMARY SECTION (MAINE CLEAN ELECTION ACT CANDIDATES)

CASH/ACTIVITY LANGE TO LANGE T				
	TOTAL FOR THIS PERIOD	TOTAL FOR CAMPAIGN		
1. CASH BALANCE FROM LAST REPORT	\$4.81			
2. SEED MONEY CONTRIBUTIONS		\$500.00		
3. MAINE CLEAN ELECTION ACT PAYMENTS & AUTHORIZATIONS	\$1,424.19	\$1,424.19		
4. SALE OF CAMPAIGN PROPERTY (Schedule E, Part 2)	\$0.00	\$0.00		
5. OTHER CASH RECEIPTS (Interest, etc.)	\$0,00	\$0.00		
6. MINUS EXPENDITURES (Schedule B)	\$907.73	\$1,402.92		
7. CASH BALANCE AT CLOSE OF PERIOD (lines 1 + 3 + 4 + 5 - 6)	\$521,27			

OTHER ACTIVITY	TO A DESCRIPTION OF THE PERSON	Section 1997 Section 1997 Section 2008
8. IN-KIND SEED MONEY CONTRIBUTIONS	2000 SP 12 S	\$0.00
9. TOTAL UNPAID DEBTS AT CLOSE OF PERIOD (Schedule D)	\$220.50	



Walker, Daniel W.

From:

Julia Fusari <julia.fusari@gmail.com>

Sent: To: Tuesday, July 10, 2012 8:23 AM Sara Gideon; Walker, Daniel W.

Subject:

Gideon

Hi Dan,

This is the vistaprint receipt for the banners that were purchased with Seed Money and included on our Seed Money Report.

On Wed, Feb 15, 2012 at 12:49 PM, Karin Vannostrand < kapervan@gmail.com> wrote: Hi Julia!

I did use Sara's clean campaign debit card for this transaction.

Karin

Make sure vistaprint@e.vistaprint.com is in your address book

Vistaprint Make an Impression.

<u>■My Account</u> Account # 9900-6257-9278

ORDER CONFIRMATION

Your Order Number: 9ZKPH-B1A60-6Q1 • Track It

Hi, Karin. Thanks for your order!

We'll send you a shipment confirmation email with details once your order ships. To check the status of your order at any time, click here.

Need Help? Visit the online Help Page or contact us directly. Please do NOT click reply to this message as it is an unmonitored address.

You May Also Like:	Preview: Documents	Description:	Qty:	Price:
80% Off Premium Business Cards Green & Clean	Sara Gideon	Banner - Medium Item #: 017-001	2	\$57,49
Addition of the state of the st	p	10 oz, Indoor Vinyl Item #: A0E-001	-	INCLUDED
250 Starting at \$19,99 \$3.99		Uploaded logo/photo/design Item #: 901-001	-	\$4.99
Get Started! 25% off Postcards		Clear Adhesive Hanger Item #: A0Q-001	2	\$5.99
ALTANOITATION ALTANOITA ALTANOITATION ALTANOITATION ALTANOITATION ALTANOITA ALTANOITA		Merc Shipping (handise: Charges: Tax: Total:	
	Here are your orde			
100 Starting at \$24,99 \$18.74	Delivery Option: Ru			

Get Started!

FREE Sticky Notes



1 Starting at \$4.99 FREE Get Started!

Arrives on or before 2/20/2012.

Payment Type: MasterCard

Card Number: XXXX-XXXX-XXXX-0362

Authorization Code: B30862

Shipping To:

Karin VanNostrand (To protect your privacy, the street address has been omitted.) Freeport ME 04032

Billed To:

Karin VanNostrand (To protect your privacy, the street address has been omitted.) Freeport ME 04032

Frequently Asked Questions:

- Can I change my shipping address?
- How do I use my promotion or coupon?
- How do 1 opt-out of email communication?
- Can I cancel my order?
- Can I change my order?
- How do I get my VAT invoice?
- How do I update my account information?
- Are your FREE product offers really FREE?

NEED HELP? Click here to browse all help topics.

Earn \$5 When You Refer a Friend



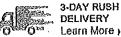














UPLOAD YOUR OWN DESIGN Learn More y

Undate Preferences Privacy Policy Please don't reply to this email as it's an unmonitored address. Offers expire . Discounts may vary by quantity. Additional charges may apply for shipping/processing, upgrades and uploads, unless otherwise specified.

Not valid in combination with other offers. Free offers only valid on the lowest quantity of each product and not valid on more than 10 items per order

Vistaprint reserves the right to revoke this offer at any time. See website for details

Vistoprint USA, Incorporated | 95 Hayden Avenue | Levington, MA 02421

PCI 1144738 PCO 912726 T 62

Julia Fusari Tree Hugger Exhibit E



Commission on Governmental Ethics and Election Practices Mail: 135 State House Station, Augusta, Maine 04333 Office: 45 Memorial Circle, Augusta, Maine

> Website: www.maine.gov/ethics Phone: 207-287-4179

Fax: 207-287-6775

2012 SEED MONEY REPORT

FOR MCEA CANDIDATES

FOR MOCA CANDIDATES		
	CANDIDA	TE
SARA GIDEON 78 BOW STREET FREEPORT OFFICE SOUGHT: REPRESI COUNTY: -NONE-	ME 04032 ENTATIVE DISTRICT: 106	TEL: FAX: E-MAIL: saragideonformalne@gmail .com
TREASURER		
BETH EDMONDS 122 HUNTER ROAD FREEPORT	ME 04032	TEL: (207)865-3869 FAX: E-MAIL: bedmondsfcl@gmail.com
TYPE	OF REPORT	REPORTING PERIOD
SEED MONEY		11/3/2010 - 3/25/2012

NO FINANCIAL ACTIVITY IN THIS REPORTING PERIOD FOR SCHEDULES A1, D

CERTIFICATION

I, SARA GIDEON, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: SARA GIDEON REPORT FILED ON: 3/25/2012

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UNSWORN FALSIFICATION IS A CLASS D CRIME (17-A M.R.S.A. § 463).

SCHEDULE A CASH CONTRIBUTIONS

- Only individuals may make seed money contributions. Contributions must be from their personal funds and not from other sources. Each contributor may give up to \$100 in seed money. Lobbyists, lobbyist associates, and their employers may not make seed money contributions during the legislative session. Members of the candidate's family may each give up to \$100 in seed money, provided the contributions are from their personal funds.
- Total seed money contributions may not exceed \$200,000 for gubernatorial candidates, \$1,500 for Senate candidates, and \$500 for House candidates.
- For contributors who gave more than \$50, the name, address, occupation, and employer must be reported. If "Information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types:
 - 1 = Candidate and Candidate's Spouse/Domestic Partner
 - 2 = Other Individuals
 - 8 = Contributors Giving \$50 or Less

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
01/07/2012	CONTRIBUTORS GIVING \$50 OR LESS		8	\$200.00
01/08/2012	CONTRIBUTORS GIVING \$50 OR LESS		8	\$50.00
02/16/2012	CONTRIBUTORS GIVING \$50 OR LESS		8	\$50.00
01/16/2012	MICHAEL BIGOS 33 BRAMBLEWOOD DRIVE AUBURN, ME 04210	ATTORNEY BERMAN & SIMMONS	2	\$100.00
01/24/2012	CONTRIBUTORS GIVING \$50 OR LESS		8	\$50.00
01/27/2012	CONTRIBUTORS GIVING \$50 OR LESS		8	\$20.00
02/02/2012	CONTRIBUTORS GIVING \$50 OR LESS		8	\$30.00
		TOTAL CASH CONTRIBUTION	NS Þ	\$500.00

SCHEDULE B EXPENDITURES

	EXPENDITURE TYPES			
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mell and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
мнѕ	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
отн	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls		nese expenditure types require a remark: CNS, EQP, FND, PRO, SAL, TRV.	

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
02/15/2012	VISTAPRINT		LIT	\$84.50
03/04/2012	VISTAPRINT		LIT	\$9.66
02/23/2012	DALE RAND PRINTING		LIT	\$262,50
03/22/2012	UNITED STATES POSTAL		POS	\$38.40
01/31/2012	GODADDY.COM		WEB	\$17.97
01/31/2012	GODADDY,COM		WEB	\$2.17
03/07/2012	KARELIA SOFTWARE	·	WEB	\$79.99
1.0000000000000000000000000000000000000		TOTAL EXPEN	lditures : ⊨>	\$495.19

SCHEDULE F SUMMARY SECTION (MAINE CLEAN ELECTION ACT CANDIDATES)

CASH ACTIVITY		
	TOTAL FOR THIS PERIOD	TOTAL FOR CAMPAIGN
1. CASH BALANCE FROM LAST REPORT (if any)	\$0.00	The second secon
2. SEED MONEY CONTRIBUTIONS (Schedule A)	\$500.00	\$500.00
3. OTHER CASH RECEIPTS (Interest, etc.)	\$0.00	\$0.00
4. MINUS EXPENDITURES (Schedule B)	\$495.19	\$495.19
5. CASH BALANCE AT CLOSE OF PERIOD (lines 1 + 2 + 3 - 4)	\$4.81	

OTHER ACTIVITY		
6. IN-KIND SEED MONEY CONTRIBUTIONS (Schedule A-1)	\$0.00	\$0.00
7. TOTAL UNPAID DEBTS AT CLOSE OF PERIOD (Schedule D)	\$0.00	7. 12.



Walker, Daniel W.

From: Sent:

Julia Fusari <julia.fusari@gmall.com>

Tuesday, July 10, 2012 8:25 AM Sara Gideon, Walker, Daniel W.

To: Subject:

Gideon Part II

Dan, this is the vistaprint receipt for the magnets that we ordered and included on our most recent filing.

----- Forwarded message -----

From: Sara Gideon < saraigideon@gmail.com>

Date: Sun, May 6, 2012 at 12:12 PM

Subject: Fwd: Your Vistaprint Order Is Confirmed

To: Julia Fusari < julia.fusari@gmail.com>

----- Forwarded message -----

From: Karin VanNostrand < karimemama@me.com>

Date: Thu, May 3, 2012 at 11:38 AM

Subject: Fwd: Your Vistaprint Order Is Confirmed To: Sara Gideon < saraigideon@gmail.com >

Karin VanNostrand MiT, NBPBWI cert karimemama@me.com 207.798.2839

Begin forwarded message:

From: Vistaprint < Vistaprint@e.vistaprint.com> Subject: Your Vistaprint Order Is Confirmed

Date: May 3, 2012 10:08:31 AM EDT

To: karimemama@me.com

Reply-To: Vistaprint < support-bw62wmya18vtebau376g3qch396e91@e.vistaprint.com>

Make sure vistaprint@e.vistaprint.com is in your address book

ccount # 9900-6257-9278

Your Order Number: 9901H-H1A04-2K6 • Track It

Hi, Karin. Thanks for your order!

We'll send you a shipment confirmation email with details once your order ships. To check the status of your order at any time, click here.

1

Need Help? Visit the online Help Page or contact us directly. Please do NOT click reply to this message as it is an unmonitored address.

You May Also Like:	Preview: Documents	Description:	Qty:	Price:
50% Off Premium Business Cards	× William,	Large Magnet Item#; 218-001	100	\$49.99
			Merchandise: Shipping Charges: Tax: Total:	\$49,99 FREE \$0.00 \$49,99
	Here are your o	rder details:		
250 Starting at \$19.99 \$9.99 Get Started! 25% off Postcards	Order Date: 5/3/2: Delivery Option: 3 You can expect to		4 Days .	
	Shipping To:			
	Karin VanNostra (To protect your Freeport ME 040 US	privacy, the street addre	ess has been omitted.)	
100 Starting at \$24.99 \$18.74 Get Started! Nickelodeon (TM) invitations & party	Billed To:			
essentials are here!	Karin VanNostra (To protect your Freeport ME 040 US	privacy, the street addre	ss has been omitted.)	
	Frequently Ask		0	
	<u> </u>	ige my shipping address		
Get Started!		use my promotion or co opt-out of email commu		
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Vistaprint USA, Incorporated | 95 Hayden Avenue | Lexington, MA 02421

PCI 1149642 PCO 912726 T 62

Sara Gideon for State Representative - District 106, Freeport & Pownal 78 bow street - freeport, me 04032 207.865.9593 (mobile) sara@saragideonforME.com or saraigideon@gmail.com www.saragideonforME.com



http://www.facebook.com/pages/Sara-Gideon-for-State-Representative/2329040334598887sk=wall

Julia Fusari Tree Hugger



dale rand Printing

104 washington Avenue Portland, Maine 04101 Phone (207) 773-8198 Fax (207) 775-0591

x (207) 775-0591	SALE BAICH II 783	REF#1803 NIH II 839515
	AMOUNT	\$78.75
BILLTO	APPR	OVED
Sara Gideon	CUSTOM	ER COPY
78 Bow Street	1	
Freeport, Maine 04032		

INVOICE

DATE	INVOICE#
4/19/2012	34321

	(0. No.	TORMS	PROJECT
DESCRIPTION	0	ſΥ	AMOUNT
Post Cards Adams Amate	Jal.	500	75.00T

DALE RAND PRINTING
101 WSHINDIGH AVE
101 WSHINDIGH AVE
101 WSHINDIGH AVE

Terminal Mi APR 23: 12 088888881 12:24 PH

Visa, Master Card, AMEX, Discover Accepted	Subtotal	\$75.00
Name	Sales Tax (5.0%)	\$3.75
NumberSignature	Total	\$78.75
Expiration	Payments/Credits	\$0.00
Date	Balance Due	\$78.75

dale rand Printing

104 washington Avenue Portland, Maine 04101 .'hone (207) 773-8198 Fax (207) 775-0591

BILIETO)	
Sara Gideon	
78 Bow Stre Freeport,Ma	

DALE RAND PRINTING
181 MINIMBION AVE
181 MINIMBION NE
181

Terminal #1 PAY 31, 12

18698888 HY 881E

AUSI Y
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HISTERCARD
HOTO
BAICH NI 729
AMOUNT

REF#: 001

\$220.50

APPROVED CUSTOMER COPY

INVOICE

DATE	INVOICE#
5/31/2012	34661

	RO. No.	TORMS	PROJECT
DESCRIPTION		QTY	AMOUNT
Post Cards 400 of 1 / 600 of 1		1,000	210.00T
Visa, Master Card, AMEX,		Subtotal	\$210,00
Discover Accepted Name		Sales Tax (5.0°	%) \$10.50
NumberSignature		Total	\$220.50
Expiration	•	Payments/Cred	lits \$0.00
Tate		Balance Du	\$220.50



FREEPORT MAIN POST OFFICE FREEPORT, Maine 040329998

2269030032-0097

03/22/2012 (207)865-4231 03:56:41 PM

Product Description	Sa	Receipt ale Unit ty Price	Final Price
32c Aloha Shirts	20	\$0.32	\$6.40
Pn/20 32c Aloha Shirts PSA	1	\$32,00	\$32.00
C1/100			######################################

Total:

Paid by: MasterCard

\$38,40

Account #:

859535

Approval #: Transaction #:

269

23903210028

Order stamps at usps.com/shop or call 1-800-Stamp24. Go to usps.com/clicknship to print shipping labels with postage. For other information call 1-800-ASK-USPS. ************ ***********



FREEPORT, Maine 040329998 2269030032-0099 05/10/2012 (207)865-4231 02:47:03 PM FREEPORT MAIN POST OFFICE

Final Price - Sales Receipt Oty Price Sale Unit 1 \$52.00 Description Shirts PSA 32c Aloha Product C1/100

\$32.00 XXXXXXXXXXXXXXXXB B47916 563 \$32.00 Account #: Approval #: MasterCard Paid by: Total:

Transaction #: 23903210029

*********************** want it with a secure Post Office Box. Sign up for a box online at Get your mail when and where you Order stamps at usps.com/shop or call 1-800-Stamp24. Go to usps.com/clicknship to print shipping labels with postage. other information call 1-800-ASK-USPS.

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FREEPORT MAIN POST OFFICE FREEPORT, Maine

04032998 2269030032-0099 05/10/2012 (207)865-4231 02:59:50 PM

	ᄔᅭ	\$32.00	\$32.00	\$32.00 \$32.00 \$49203 565
Sales Sector II	Sale Unit Oty Price	1 \$32.00		**
J	Product Description	32c Aloha Shirts PSA Cl/100	Total:	Paid by: MasterCard Account #: Approval #: Transaction

want it with a securiost Office Box. Sign up for a Lo., orline at Get your sail when and where you ************************* Order stamps at usps.com/shop or call 1-800-Stamp24. Go to usps.com/clicknship to print shipping labels with postage other information call -800-ASK-USPS.

Exhibit J

FREEPORT MAIN POST OFFICE FREEPORT, Maine 040329998 2268030032-0097

08/01/2012 (207)865-4231 03;51;09 PM

Sales Receipt				
Product Description	\$	ale Unit ty Price	Final Price	
32c Aloha Shirts PSA C1/100	9	\$32.00	\$288.00	
32c Aloha Shirts Pn/20	38	\$0.32	\$12.16	

======= total: \$300.16

aid by:

tasterCard

\$300.16

Account #: Approval #:

B85180 Transaction #: 219 25 13210029

c er stamps at usps.com/shop or call '-Stamp24. Go to usps. licknship to print shipping labels with postage. For other information call 1-800-ASK-USPS.

*********** **********

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STATE OF MAINE COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES 135 STATE HOUSE STATION AUGUSTA, MAINE 04333-0135

July 17, 2012

By E-Mail and By Hand

Daniel W. Walker, Esq.
Preti Flaherty Beliveau & Pachios, LLP
P.O. Box 1058
Augusta, ME 04332-1058

Dear Mr. Walker:

This letter is to notify you that the anonymous complaint concerning Sara Gideon will be scheduled for the July 25, 2012 meeting of the Maine Commission on Governmental Ethics and Election Practices. The meeting will be held at 10 a.m. (one hour later than previously scheduled) at our office located at 45 Memorial Circle, 2nd Floor, Augusta, Maine.

The Commission staff has received advice from agency counsel that the complaint meets the requirements for an official request for an investigation. The staff will be scheduling it for the meeting, and will be recommending no further action by the Commission.

If you have any questions, please do not hesitate to call me at 287-4179.

Sincerely,

Jonathan Wayne
Executive Director

OFFICE LOCATED AT: 45 Memorial Circle, Augusta, Maine WEBSITE: www.maine.gov/ethics

PHONE: (207) 287-4179

FAX: (207) 287-6775